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Vanessa Mitchell, and Don'te Mitchell

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 MARY SMITH, individually, and as Special
Administrator of the Estate of JAMES PEREA,

12 Plaintiffs,

13 vs.

14 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; WELLPATH, LLC; RN
15 RACHEL CLARK; RN TANJA
WASIELEWSKI; RN GENEVA BESSIE;
16 LCSW SANDRA CELIS; MA/LNA MELEKA
ST. JOHN. RN STEPHANIE ESTALA; NP
17 HUGH ANDREW ROSSET; NP SHELLEY
AMEDURI; PA ANDREA BALOGH; RN
18 AYNUR KABOTA; CORRECTIONS
OFFICER VENESSA MITCHELL;
19 CORRECTIONS OFFICER DON'TE
MITCHELL; CORRECTIONS OFFICER
20 JOSHUA WALDMAN; DOES 1-30,

21 Defendants.

Case No.: 2:23-cv-00092-JAD-NJK

**STIPULATION TO EXTEND DEADLINE
FOR LVMPD DEFENDANTS TO FILE
REPLIES IN SUPPORT OF THE
MOTIONS FOR SUMMARY JUDGMENT
(First Request)
[ECF Nos. 143, 144]**

22 Pursuant to Local Rule 6-1, Mary Smith, individually and as Special Administrator of the
23 Estate of James Perea ("Plaintiffs"), Las Vegas Metropolitan Police Department, Vanessa
24 Mitchell, and Don'te Mitchell ("LVMPD Defendants"), stipulate, agree, and request that the

1 Court extend the deadline for LVMPD Defendants to file their Replies in support of the pending
 2 Motions for Summary Judgment, (ECF Nos. 143, 144), from the current date of June 13, 2025,
 3 for an additional 10 days, to Monday, June 23, 2025.¹ The parties agree that good cause supports
 4 the minimal extension of the briefing schedule based on counsel for LVMPD Defendants being
 5 out of the office between June 9 to 11, 2025; the holiday on June 19, 2025; and LVMPD
 6 Defendants' counsel having a telephonic appellate hearing set in another matter for June 13,
 7 2025. The administrative agency overseeing that hearing only recently announced the final
 8 hearing date.

10 DATED this 12th day of June, 2025.

11 By: /s/ Lyssa S. Anderson
 12 Lyssa S. Anderson (SBN 5781)
 13 Kristopher J. Kalkowski (SBN
 14 14892)
 15 1980 Festival Plaza Drive, Suite 650
 16 Las Vegas, Nevada 89135
 17 *Attorneys for LVMPD Defendants*

DATED this 12th day of June, 2025.

By: /s/ Peter Goldstein
 Peter Goldstein (SBN 6992)
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Clyde Rastetter
 199 Cook Street, Suite 308
 Brooklyn, NY 11206
Attorney for Plaintiffs

IT IS SO ORDERED.

DATED this 13th day of June, 2025.


 UNITED STATES DISTRICT JUDGE

¹ Wellpath, LLC, Rachel Clark, Tanja Wasielewski, Geneva Bessie, Sandra Celis, Meleka St. John, Stephanie Estala, Hugh Andrew Rosset, Shelley Ameduri, and Andrea Balogh ("Wellpath Defendants") are not included in this Stipulation because the bankruptcy stay has only been lifted as to LVMPD Defendants and Plaintiffs. *See* (Order, ECF No. 140).